

EXHIBIT E

"AFFIDAVIT OF TRUTH"

STATE OF MARYLAND

ALLEGANY COUNTY

STATEMENT OF FACTS

On the DATE of February 1, 2012 At Approximate 9:00am. Correctional Officer II Joshua Snyder, an employee of The Maryland Division of Correction, Came to my cell id A.H.U., which is the Lock-up Housing Unit for Maryland Correctional Institution - Hagerstown. Officer Snyder opens my cell door with the Handcuffs in his hand. Officer Snyder Asks me to STEP OUT OF CELL AND turn AROUND, so that I can Be Handcuffed. I Turned Around and give Officer Snyder my right Arm first. Officer Snyder States to me, "Give me your other Arm first," I do as I'm Told to do and hand him my left Arm. Officer Snyder Then Proceed to try to place the Handcuff overtop of my Watchband. I Asked Officer Snyder "Can He Please Place the Handcuff under my Watchband so that the Handcuff will not cut into my Arm."

Officer Snyder Responds By saying, "Don't Tell me how to do my F..... Job!" Officer Snyder Then Takes my left Arm and Attempts to throw me into the wall. I Then Pull my Arm AWAY and Asked Officer Snyder "What The Hell are you Doing?" Officer Snyder Then pulls his mace and Sprays me in the face, I Put my Hands up to stop the mace from getting in my face (Officer Snyder has the little can of mace, Not the Big can)

As I'm Backing Away, Officer Snyder grabs his Walkie Talkie And calls Signal 13, Which is code for officer needs Assistance.

Correctional Officer Mills, Correctional Officer Boggs, Correctional Officer Ulger, And Sergeant Thomas, Were The First To respond. Officer Unger runs straight to me And tackle's me Football style And takes me off my feet And I Fall To my knees And someone sprays me directly into my eyes At close range With the Big Can of mace.

I Was Then Handcuffed And Beaten, Kicked, Punched And Beat in the Head repeatedly With The mace Can, causing me to Receive 5 staples in the Back of my Head. I Was Then Ticked-up And dragged to medical Dept. Once We Were At The medical Dept. I Can Hear them clearing Everyone out. I Was Taken to A room And I Was Then Beaten, Punched, And Kicked By Numerous Officers that I Could Not See And identify From being Blinded From the mace.

I Would Like to Point out That Both Times That I Was Beaten, I Was Handcuffed Behind my Back.

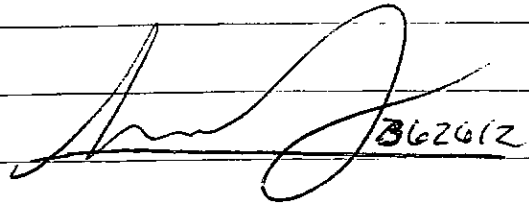
I Was Then Cleaned up, 5 Staples Put in Back of my Head And Was Placed in Holding Cell until Transport Came to get me Around 10:45 - 11:00 AM Where I Was Then Taken to N.B.C.I, A Maximum Security Prison, Where Pictures Were Taken again Because N.B.C.I Did Not Want To Be Held Accountable for the Damage that Was Done to me.

My Face And Head Were Swollen Beyond Recognition, I Still Can Not See out my Left Eye clearly, I Have Black marks on my wrist

from the Handcuffs Being put on so tight, AS IF they were trying to Break my Wrist, and I Have constant Headachs that Sometimes Feel like Migraines.

I solemnly affirm under the Penalties of Perjury that the Contents of this Affidavit Truth Are True to the Best of my knowledge, Information and belief.

March 29, 2012



862612

Michael P. Youse ID #362612

N.B.C.I.

14100 McMiller Hwy, S.W.
Cumberland, Maryland 21502